

SouthEast Telephone

existing infrastructure reduces input costs to carriers, which along with competition, leads to more affordable services for both residential and business consumers."²

SouthEast encourages the Commission to act expeditiously to preserve the resilient legacy copper network plant in the furtherance of its objective of ubiquitous broadband coverage and competitive alternatives for **ALL** consumers.

Respectfully submitted,



Bethany Bowersock
In House Counsel
SouthEast Telephone, Inc.

²*Id.* at pg. 2.

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EXPARTE NOTICE

December 15, 2009

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: GN Docket Nos. 09-47, 09-51, 09-137, and RM-11358

Dear Ms. Dortch:

SouthEast Telephone, Inc., ("SouthEast"), is a competitive local exchange carrier ("CLEC") that provides local service, long distance and broadband services to the rural areas of Eastern and Central Kentucky. SouthEast would like to express its endorsement and support of COMPTEL's proposed rule changes and pricing guidelines, governing incumbent local exchange carrier ("ILEC") copper loop network retirement, as an instrumental means to achieve national broadband objectives.¹

On the "information super highway", many rural Americans are left on the side of the road without the opportunity to experience high-speed broadband. The ILECs' deployment plan follows the more profitable path of servicing metropolitan markets first, then rural markets as their business plan allows. If the Commission is looking to fulfill the promise of ubiquitous broadband service across the United States, then open access to existing copper infrastructure is a necessity.

The greatest threat to competitive broadband expansion over existing copper infrastructure are ILECs increasingly retiring copper plant in the absence of any affirmative obligation to make sure plant is available to competitors who have not yet deployed networks in areas served by the retired plant, effectively precluding the provision of competitive alternative benefits to the consumers.

SouthEast agrees with COMPTEL's proposal in that;

"it ensures maximum utilization of existing infrastructure viable for the effective and efficient provisioning of competitive broadband/advanced services. The ability to provide innovative broadband services over

¹See Letter from Karen Reidy, COMPTEL, to Marlene Dortch Secretary, Federal Communications Commission, GN Docket Nos. 09-47, 09-51, 09-137, and RM-1138 (December 7, 2009) ["COMPTEL proposal"].